

Exhibit 1

NOTICE OF COLLECTIVE ACTION LAWSUIT

Hickman, et al v. TL Transportation, LLC, et al., No. 2:17-cv-01038-GAM (E.D. Pa.)

This Notice contains important information about your rights under a federal law called the Fair Labor Standards Act, 29 U.S.C. § 201, *et seq.* (“FLSA”).

You are receiving this Notice because you are a current or former Delivery Associates who were paid by TL Transportation, LLC to deliver packages for Amazon in the United States between [insert date three years prior to the date that the Court issues an Order granting Conditional Certification] and the present (the “FLSA Collective”).

The Court authorized this Notice to be sent out, but takes no position on the merits of the lawsuit.

This Notice describes the lawsuit and how you can file a claim for unpaid wages in this case.

What’s the lawsuit about?

The lawsuit seeks to recover allegedly unpaid wages and overtime for Delivery Associates who were paid by Defendant TL Transportation, LLC, Scott Foreman and Herschel Lowe (together, “TLT”) to deliver packages for Defendants Amazon Logistics, Inc. and Amazon.com, LLC (together, “Amazon”). The lawsuit alleges that Delivery Associates were not properly paid for all time worked and overtime wages when they worked more than forty (40) hours in a week. In the lawsuit, Plaintiffs’ claims seek back pay, including unpaid overtime wages, plus liquidated damages in an amount equal to unpaid wages, reasonable attorneys’ fees, and court costs.

Defendants deny Plaintiffs’ allegations and deny that they are joint employers, and they will ask the Court to deny Plaintiffs’ claims.

Can I join?

You can join this lawsuit if you are or were a Delivery Associate and were paid by TL Transportation, LLC to deliver packages for Amazon at any time between [DATE] and the present.

How do I join?

If you wish to join this lawsuit, fill out the enclosed “Opt-in Consent Form” and send it to the address listed on the form, by mail, email or fax. You may also complete and submit the form electronically at [insert hyperlink].

What are my legal rights if I join?

If you join this lawsuit, you will be bound by the result of this case, whether it is favorable or unfavorable. The right to recovery for any plaintiff is not guaranteed or certain, and depends on the adjudication of the claim. If the employees win, you may get additional compensation for unpaid overtime, if any. If they lose, you will get nothing

If you join this lawsuit, you may be required, with the assistance of the Plaintiffs’ lawyers, to respond to written questions, provide documents, attend a deposition and/or testify in court. The attorneys for the Plaintiffs are being paid on a contingency fee basis, which means that if there is no recovery, there will be no attorneys’ fees. You are not under any obligation to pay any attorneys’ fees or costs. You will owe no money to any lawyers, win or lose.

Who represents the employees?

The law firms of Berger & Montague, P.C. and Willig, Williams & Davidson will represent those who receive this notice and join the collective action. You may also consult with or retain the attorney of your choice.

What if I have questions or need an Opt-In Consent Form?

Camille Fundora
Berger & Montague, P.C.
Phone: (215) 875-3033
Email: cfundora@bm.net

Please return your form as soon as possible, but no later than [DATE] so that your rights may be preserved.

No retaliation permitted

Federal law prohibits TLT, Herschel Lowe, Scott Foreman or Amazon from terminating you, retaliating against you, or in any other manner discriminating against you because you join this lawsuit.